

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

NILOFER NANLAWALA,

Plaintiff,

v.

CITY OF CHICAGO, *et al.*

Defendants.

Case No.: 21-cv-5624

Hon. Matthew F. Kennelly

Magistrate Judge Sunil R. Harjani

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE PLEAD**

Defendant, City of Chicago (“the City”), through its attorney, Celia Meza, Corporation Counsel for the City moves for an extension of time to answer or otherwise plead to the First Amended Complaint. The City states the following in support of its motion.

1. Plaintiff filed her First Amended Complaint on December 14, 2021. (Dkt. No. 7). The City’s responsive pleading is currently due December 28, 2021. Fed. R. Civ. P. Rule 15(a)(3).

2. The City requests an extension until February 10, 2022 to answer or otherwise respond to the First Amended Complaint.

3. The undersigned conferred with Plaintiff’s counsel on December 22, 2021, who indicated she does not object to the City’s requested extension.

4. The reasons for the requested extension are as follows:

- a. The undersigned attorney was assigned this matter recently and is still conducting a preliminary investigation into the allegations.
- b. The undersigned has briefs due in the following matters in January:
 - i. *Bowers v. City of Chicago*, 19 L 894 (Cir. Court Cook County) - response to Plaintiff’s motion to vacate dismissal

- ii. *Baggett v. City of Chicago, et al.*, 21-cv-3841 (N.D. Ill.) – reply in support of motion to dismiss
- iii. *Turney v. City of Chicago*, 21-cv-04205 (N.D. Ill.) – responsive pleading to First Amended Complaint
- iv. *Postrelko v. City of Chicago, et al.*, 21 L 6834 (Cir. Court Cook County) – responsive pleading to First Amended Complaint
- v. *Valdez v. City of Chicago, et al.*, 20 cv 388 (N.D. Ill.) – Rule 56 motion for summary judgment.

Conclusion

For the foregoing reasons, Defendant City of Chicago respectfully requests this Honorable Court grant it an extension of time until February 10, 2022 to answer or otherwise respond to Plaintiff's First Amended Complaint.

Dated: December 23, 2021

Respectfully submitted,

CELIA MEZA
Corporation Counsel
of the City of Chicago

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